

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re U. S. Steel Consolidated Cases

Civil Action No. 17-579

Judge Cathy Bissoon

**PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION
SETTLEMENT AND PLAN OF ALLOCATION**

Plaintiffs respectfully submit this Motion for Final Approval of Class Action Settlement and Plan of Allocation. As set forth more fully in Plaintiffs' accompanying memorandum of law, the \$40 million all-cash Settlement represents an excellent result for the Settlement Class and is the result of nearly five years of hard-fought litigation.

Plaintiffs and their counsel were well informed of the strengths and weaknesses of their claims through, *inter alia*, an extensive pre-suit investigation, completion of extensive merits and expert discovery, successfully defeating Defendants' motion to dismiss and opposition to class certification, attending four separate arms-length mediation sessions with the U. S. Steel Defendants overseen by experienced mediators and a settlement conference with the Court. The Settlement has the full support of Plaintiffs.

The Plan of Allocation, which was developed by Plaintiffs' consulting damages expert in consultation with Lead Counsel, provides a reasonable method for allocating the Net Settlement Fund among Settlement Class Members on a *pro rata* of the recovery.

Plaintiffs have conferred with the U. S. Steel Defendants, through counsel, who confirmed the U. S. Steel Defendants do not oppose the relief requested in this motion.

Plaintiffs' Motion is supported by the accompanying Memorandum of Law in Support of the Settlement and Plan of Allocation, the Declaration of Shannon L. Hopkins and accompanying

exhibits and all other filings in the record. As of the date of this motion, there have been no objections to that proposed Settlement or Plan of Allocation. Plaintiffs further submit a proposed final order and judgment substantially identical to the version preliminarily approved by the Court, and a proposed order granting the Plan of Allocation.

For the reasons set forth below, the proposed Settlement and Plan of Allocation are fair, reasonable and adequate should be approved.

DATED: February 6, 2023

LEVI & KORSINSKY, LLP

By: /s/ Shannon L. Hopkins
Shannon L. Hopkins

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-and-

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CERTIFICATE OF SERVICE

I hereby certify that on February 6, 2023, I served a copy of the foregoing document on all appearing counsel through the Court's ECF system.

/s/ Shannon L. Hopkins
Shannon L. Hopkins